

### **REMARKS**

Claims 8-26 are pending in this application. Claims 8-26 stand rejected. Claim 13 stands objected to. Claims 8, 18 and 20 have been amended. Claims 27-31 have been added. It is respectfully submitted that no new matter has been added by the present amendment.

### **Claim Objection**

Claim 13 stands objected to for the reasons stated on pages 2 and 3 of the Office action. In response, applicants have amended base claim 8 to address all the issues raised by the Examiner. As such, withdrawal of the claim rejection is respectfully requested.

### **Claim Rejections under 35 U.S.C § 112**

Claims 8-26 stand rejected under 35 U.S.C. 112, second paragraph, for the reasons stated on page 3 of the Office action. In response, applicants have amended claims 8, 18 and 20 to address all the issues raised by the Examiner. As such, withdrawal of the claim rejection is respectfully requested.

### **Rejections under 35 U.S.C § 103**

Claims 8-11, 13-22 and 24-26 stand rejected under 35 U.S.C § 103 (a) as unpatentable over Kamikawa et al. (US 6,299,696) in view of Dexter et al. (US 5,524,361).

Amended claims 8, 18 and 20 recite, *inter alia*, a separation plate having an exhaust path passing a drying fluid comprising a gas from the drying room into the cleaning room. In exemplary embodiment of the present invention, when gases filling the drying room (200) are exhausted to the cleaning room (100) through an exhaust path (410) formed in the separation plate, the drying room (200) is decompressed as the

surface of the DI water in the cleaning room (100) is lowered. As such, it is not necessary to install a special pump. See e.g., Fig. 18 and paragraphs [0057] and [0058] of the present application. Applicants respectfully submit that neither Kamikawa, Dexter nor any combinations thereof teaches or suggests the above claimed features.

Kamikawa does not disclose a separation plate having an exhaust path passing a drying fluid comprising a gas from the drying room into the cleaning room. The Examiner states that Kamikawa discloses a separation plate (7) or a shutter (50) with an exhaust path (56). However, the exhaust path (56) of Kamikawa does not pass a drying fluid comprising a gas. In contrast, the exhaust path (56) passes only liquid. See e.g., lines 45-67 of column 6 of Kamikawa. Indeed, the gas filling the chamber (2) is exhausted through the exhaust pipe (27) that is formed in a wall of the chamber (2). See e.g., Fig. 2 and lines 51-54 of column 5 of Kamikawa. As such, unlike the claimed embodiment of the present invention, Kamikawa must have a special pump (54) to decompress the drying room (2). See e.g., Fig. 2 of Kamikawa.

Dexter does not cure the deficiency in this regard.

In relation to claims 8, 18 and 20, the Examiner asserts that it would have been obvious to one of ordinary skill in the art at the time of the invention to use the known technique of varying the location and quantity of holes in a plate in order to result in uniform air distribution and drying of a product within an apparatus as taught by '361 within the apparatus taught by '696. But '696 has an exhaust pipe 27 in the sidewall of the chamber and a shutter 7 of '696 does not have exhaust paths. There is no motivation to substitute the shutter 7 of '696 not having an exhaust path with the perforated plate 40,

40', 40" of '361 for uniform air distribution, because the shutter 7 of '696 is not used as an exhaust passage.

Accordingly, even assuming, *arguendo*, that the above references were combined, the combination does not disclose or suggest a separation plate having an exhaust path passing a drying fluid comprising a gas from the drying room into the cleaning room.

Thus, claims 8, 18 and 20 are not rendered obvious by the above references. As claims 9-11 and 13-17 depend from claim 8, claim 19 depends from claim 18, and claims 21, 22 and 24-26 depend from claim 20, these dependent claims are also not rendered obvious by the above references for at least these reasons.

Based on the arguments above, reconsideration and withdrawal of the rejection of claims 8-11, 13-22 and 24-26 under 35 U.S.C § 103 (a) is respectfully requested.

Claims 9 and 24 stand rejected under 35 U.S.C § 103 (a) as unpatentable over Kamikawa et al. (US 6,299,696) in view of Dexter et al. (US 5,524,361) and further in view of Kamikawa et al. (US 6,068,002).

Claims 9 and 24 depend from claims 8 and 20, respectively. These dependent claims are allowable due to their dependency on the allowable respective base claims. Furthermore, Kamikawa '002 does not disclose a separation plate having an exhaust path passing a drying fluid comprising a gas from the drying room into the cleaning room. Based on the arguments above, reconsideration and withdrawal of the rejection of claims 9 and 24 under 35 U.S.C § 103 (a) is respectfully requested.

Claims 12 and 23 stand rejected under 35 U.S.C § 103 (a) as unpatentable over Kamikawa et al. (US 6,299,696) in view of Dexter et al. (US 5,524,361) and further in view of Kamikawa et al. (US 2003/0159718).

Claims 12 and 23 depend from claims 8 and 20, respectively. These dependent claims are allowable due to their dependency on the allowable respective base claims. Furthermore, Kamikawa '718 does not disclose a separation plate having an exhaust path passing a drying fluid comprising a gas from the drying room into the cleaning room. Based on the arguments above, reconsideration and withdrawal of the rejection of claims 12 and 23 under 35 U.S.C § 103 (a) is respectfully requested.

For the foregoing reasons, the present application is believed to be in condition for allowance. The Examiner's early and favorable action is respectfully requested. The Examiner is invited to contact the undersigned if he has any questions or comments in this matter.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Jay H. Maioli", is written over a horizontal line.

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